

The Honorable Marsha J. Pechman
Trial Date: June 23, 2025

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JAMALL S. BAKER,

Plaintiff,

v.

TAMMY O'REILLY, et al.,

Defendants.

NO: 2:21-cv-00361-MJP

DECLARATION OF TANIA SETHI
KAMJULA IN SUPPORT OF
PLAINTIFF'S FEE REQUEST

I, Tania Sethi Kamjula, declare as follows:

1. I am over the age of 18, of sound mind, and otherwise competent to make this declaration.

2. I have personal knowledge of the facts stated in this declaration based on my experience, training, education, personal involvement as counsel for Plaintiff Jamall S. Baker.

3. I am an attorney licensed to practice law in Texas since 2017 and Washington since 2023. I currently practice as an associate attorney with the firm of Byrnes Keller Cromwell LLP ("BKC") in Seattle, Washington. Since I began practicing law in 2017, I have primarily been engaged in litigation matters in various jury and non-jury civil trials in federal and state courts, and final hearings before administrative law judges and immigration court judges. I have also served as appellate counsel before the Court of Appeals for the Fifth District of Texas at Dallas,

1 the Court of Appeals for the Sixth District of Texas at Texarkana, and the Court of Appeals for
2 the State of Washington Division I.

3 4. I have been primarily responsible for handling this matter since June 2024 and have
4 reviewed all attorneys' fees and expenses in this matter. A true and correct redacted copy of
5 Plaintiff's fee report is attached as **Exhibit 1**. Highlighted in pink are the fees and costs incurred
6 in connection with Plaintiff's Motion for Sanctions.

7 5. For the reasons explained below, it is my opinion that \$41,000.00 is a reasonable
8 and necessary amount of attorneys' fees and expenses incurred in connection with Plaintiff's
9 Motion for Sanctions.

10 **A. The Hourly Rates are Reasonable.**

11 6. I am familiar with the reasonable and customary rates charged for services on
12 litigation matters in Washington, the Western District of Washington, and Seattle. I am also
13 familiar with the reasonable and customary rates for services and awards of attorneys' fees in cases
14 where the spoliation of evidence has occurred.

15 7. The rates charged in this case are based upon the experience, reputation, and ability
16 of the attorneys and paralegals performing the services and the amount in controversy. The billing
17 attorney's CVs can be found at www.byrneskeller.com.

18 8. The hourly rate I charged for this matter is \$335.00, the hourly rate the partners
19 charged for this matter ranged from \$550.00 to \$625.00, and the hourly rate the paralegals charged
20 for this matter is \$195.00.

21 9. Based on the nature of this case and the billing attorneys' and paralegals'
22 experience, it is my opinion that the hourly rates in paragraph 8 are reasonable for similar work
23 done in the Western District of Washington and, more specifically, Seattle, Washington.

1 **B. The Hours Billed are Reasonable and Necessary.**

2 10. I am familiar with the reasonable and customary hours worked for services on
3 litigation matters in Washington, the Western District of Washington, and Seattle. I am also
4 familiar with the reasonable and customary hours worked for services and awards of attorneys'
5 fees in cases where the spoliation of evidence has occurred.

6 11. BKC billed by 1/10th of an hour for various legal work. BKC normally did not bill
7 for multiple-attorney conferences or duplication of efforts by multiple attorneys and used
8 paralegals and associates to perform substantive legal work when available.

9 12. The hours worked in this case are based upon the amount in controversy and the
10 experience, reputation, and ability of the attorney and paralegal performing the services. The
11 issues presented in bringing the motion for sanctions are complex and unique. There is limited
12 controlling authority and guidance on the issues related to a prisoner's litigation against
13 correctional employees and the independent responsibilities of correctional employees distinct
14 from the Department of Corrections.

15 13. Between March 31, 2025 and June 3, 2025, BKC reasonably and necessarily billed
16 114.6 hours on this matter, including 82.1 hours by me, 7.2 hours by the partners, and 29 hours by
17 the paralegals.

18 14. Since June 3, 2025, BKC has done additional work on this matter specifically
19 related to this fee request. As of June 16, 2025, BKC reasonably and necessarily billed
20 approximately an additional \$2,700.00 on this matter, including five hours billed by me at \$335.00
21 per hour, one hour billed by a partner at \$625.00 per hour, and two hours billed by a paralegal at
22 \$195.00 per hour.

23 15. Based on the nature of the work performed and the hours billed by the attorneys
24 and paralegals, it is my opinion that the hours in paragraphs 13 and 14 are customary, reasonable,
25 and necessary for similar work done in the Western District of Washington and, more specifically,
26 Seattle, Washington.

1 I declare under penalty of perjury under the laws of the State of Washington and the
2 United States that the foregoing is true and correct.

3 DATED this 16th day of June, 2025, at Seattle Washington.

4 /s/ Tania Sethi Kamjula
5 Tania Sethi Kamjula, WSBA #61732
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CERTIFICATE OF SERVICE

The undersigned attorney certifies that on the 16th day of June, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel on record in the matter.

/s/ Tania S. Kamjula
Tania S. Kamjula, WSBA # 61732

EXHIBIT 1

Client: 2221.0001Z BAKER/JAMALL S.

BAKER/JAMALL S.

Contact: JAMALL S. BAKER

RE: JAMALL S. BAKER V. SERGEANT HOPKINS, SERGEANT PALMER, OFFICER

OFFICER TAMMY O'REILLY, MELINDA TUGGL

Primary Timekeeper: 6 TSK Category: 1 GENERAL LITIGATION
 Secondary Timekeeper: 6 TSK Draft Template: NOBILL Rate Code: 6
 Originating Timekeeper: 6 TSK Final Template: NOBILL Date Opened: 06/03/2024
 Previous Balance: 0.00

NURSE JOAN JEGGAR

Date	Tkpr	Tcode	Ref #	Rate	Units	Hours Worked	Hours to Bill	Amount	Description
Fees									
05/30/2025	2 BSK	99	306	625.00		2.50	2.50	1,562.50	[REDACTED] conference Kamjula regarding sanctions motion [REDACTED] (.3); review email from court regarding questions regarding pending sanctions motion [REDACTED] (.4).
06/02/2025	2 BSK	99	326	625.00		1.40	1.40	875.00	Review all pleadings regarding pending sanctions motion (.7); [REDACTED] regarding sanctions motion hearing (.7).
06/03/2025	2 BSK	99	327	625.00		1.50	1.50	937.50	Monitor hearing regarding sanctions motion (1.2); follow-up emails [REDACTED] (.3).
06/04/2025	2 BSK	99	328	625.00		0.80	0.80	500.00	Multiple emails to/from Petrak and Kamjula regarding [REDACTED]
Billable Total: 2 BRADLEY S. KELLER						6.20	6.20	3,875.00	
03/02/2025	6 TSK	25	178	335.00		4.70	4.70	1,574.50	Review Defendants' supplemental production of grievances and draft memo re outstanding discovery from Defendants.
03/03/2025	6 TSK	25	177	335.00		1.00	1.00	335.00	Emails with Williams re deposition of Weiskopf and other witnesses (.1); strategize [REDACTED] (.4); review [REDACTED] (.2); review additional documents to supplement Plaintiff's production (.3).
03/04/2025	6 TSK	25	180	335.00		2.20	2.20	737.00	Confer with Williams re depositions (.8); review [REDACTED] (.3); prepare supplemental documents for production (.4); call with client re [REDACTED] (.4); confer with Petrak re [REDACTED] (.3).
03/05/2025	6 TSK	25	181	335.00		0.30	0.30	100.50	Emails with Williams re discovery deficiency and depositions.
03/06/2025	6 TSK	25	186	335.00		1.20	1.20	402.00	Emails with Meyonka re [REDACTED] (.9); email Sandusky and Russell re [REDACTED] (.1); review emails from DOC re public records request (.2).
03/07/2025	6 TSK	25	182	335.00		2.20	2.20	737.00	Confer with AG's office re depositions (.7); draft letter to client re [REDACTED] (.1.3); confer with Sandusky re [REDACTED] (.1); confer with Russell and Sandusky re [REDACTED] (.1).
03/10/2025	6 TSK	25	183	335.00		12.60	12.60	4,221.00	Emails with Williams re discovery negotiations, agreements, and supplementation and Defendants' statutory obligations to pay attorneys' fees (5.5); evaluate [REDACTED] (1.0); emails with Sandusky re [REDACTED] (.2); amend discovery responses and prepare additional documents for production (5.0); email AG's office for infraction documents missing from production but identified as produced (.1); email MCC re preapproval for client to attend in-person depositions at MCC and preapproval for client to appear virtually for Zoom depositions (.8).
03/11/2025	6 TSK	25	185	335.00		9.80	9.80	3,283.00	Review DOC policies and ninth circuit authority re [REDACTED] (.4); email MCC re request to move depositions from WSR to VR (.2); confer with Savage re [REDACTED] (.2); confer with Sandusky re [REDACTED] (1.0); email pro bono coordinator Nero re [REDACTED] (.2); draft detailed letter to client re [REDACTED] (2.0); review defendants' discovery responses and production notes and draft deposition questions, subpoenas duces tecum, and discovery requests (4.5); phone call with client re [REDACTED] (.3); review supplemental documents produced in response public records request (1.0).
03/12/2025	6 TSK	25	191	335.00		10.60	10.60	3,551.00	Draft additional discovery requests (3.6); draft subpoena duces tecum (2.0); meet and confer with AG's office re outstanding discovery (2.0); email and serve discovery requests on Defendants (.1); review request for communications re certain DOC policies and email opposing counsel re revised request for same (.3); draft objections to plaintiff's subpoenas to Weiskopf, K&L Gates, and JPay and serve same (1.5); emails with MCC re visits with client and other inmates in preparation of depositions (.3); emails with MCC and Williams re changes to deposition schedule (.8).
03/13/2025	6 TSK	25	192	335.00		3.90	3.90	1,306.50	Draft letter to Nero re [REDACTED] (3.8); emails with Sandusky re [REDACTED] (.1).
03/14/2025	6 TSK	25	195	335.00		6.20	6.20	2,077.00	Extensive emails with opposing counsel re depositions and discovery (1.5); emails with MCC re deposition and meetings with client in prep for deposition (.1); research [REDACTED] (.8); revise subpoenas duces tecum and

Client: 2221.0001Z BAKER/JAMALL S. (Continued)

Date	Tkpr	Tcode	Ref #	Rate	Units	Hours Worked	Hours to Bill	Amount	Description
03/17/2025	6 TSK	25	196	335.00		3.20	3.20	1,072.00	deposition notices (3.8). Revise letter to Nero for [REDACTED] [REDACTED] (.5); emails with MCC re deposition prep meetings with client and other inmates (.4); draft responses to Crouse's second interrogatories and requests for production and revise supplemental discovery responses (1.6); emails with opposing counsel re Kampman's deposition and subpoena (.1); call with Danni re medical procedures and conflict with deposition date (.1); call with client re [REDACTED] [REDACTED] (.2); amend letter to Nero with [REDACTED] [REDACTED] (.3).
03/18/2025	6 TSK	25	197	335.00		0.30	0.30	100.50	Emails with MCC and Nguyen re deposition logistics and schedules.
03/20/2025	6 TSK	25	200	335.00		0.30	0.30	100.50	Prepare for Crouse's deposition.
03/21/2025	6 TSK	25	201	335.00		2.50	2.50	837.50	Emails with MCC re inmate visits (.1); prepare for depositions of all witnesses (2.4).
03/22/2025	6 TSK	25	208	335.00		4.80	4.80	1,608.00	Prepare for Harris' deposition.
03/23/2025	6 TSK	25	202	335.00		5.00	5.00	1,675.00	Research [REDACTED] [REDACTED] (1.0); prepare for Crouse's deposition (4.0).
03/24/2025	6 TSK	25	203	335.00		13.20	13.20	4,422.00	Travel to/from MCC for witness interviews in preparation for depositions (1.2); interviews and meetings with client, Riley, Stoddard, Danni, Hood, and White (9.0); prepare for Crouse's deposition (3.0).
03/25/2025	6 TSK	25	204	335.00		14.70	14.70	4,924.50	Finish review of emails produced by Defendants (.8); emails with opposing counsel re subpoenaed documents from JPay and K&L Gates (.1); emails with opposing counsel re Defendants' supplemental production (.5); ex parte email with court re [REDACTED] [REDACTED] (.1); prepare for Crouse and Harris' depositions (13.2).
03/26/2025	6 TSK	25	207	335.00		13.30	13.30	4,455.50	Prepare exhibits for Harris' deposition (.6); drive to and from MCC for Crouse's deposition (1.0); take Crouse's deposition at MCC (7.0); email Williams re more documents not produced from Crouse per his deposition testimony and protective order re Stoddard's deposition (.7); prepare for Harris' deposition (4.0).
03/27/2025	6 TSK	25	209	335.00		10.30	10.30	3,450.50	Travel to/from MCC for Harris' deposition (1.0); take Harris' deposition (7.8); debrief with Molina re [REDACTED] (.5); research [REDACTED] (1.0).
03/28/2025	6 TSK	25	210	335.00		8.80	8.80	2,948.00	Debrief depositions with Savage and Molina (.4); draft search terms and parameters for communications re DOC policies (1.5); emails with MCC and AG's office re Danni's deposition (.1); review K&L's subpoenaed documents for privilege (1.5); draft subpoenas for documents to additional inmates (1.5); prepare for depositions next week (3.7); call with client re [REDACTED] (.1).
03/30/2025	6 TSK	25	211	335.00		9.50	9.50	3,182.50	Prepare for Hoskins' deposition (7.5); prepare for Sutherland's deposition (2.0).
03/31/2025	6 TSK	25	217	335.00		10.60	10.60	3,551.00	Review subpoenaed documents from Hoskins (.1); take Hoskins' deposition on Zoom (3.8); review [REDACTED] [REDACTED] (4.2); prepare for Weiskopf's deposition (2.5).
04/01/2025	6 TSK	25	218	335.00		9.10	9.10	3,048.50	Research [REDACTED] [REDACTED] (.7); attend Weiskopf's deposition (3.0); debrief with client re [REDACTED] (.3); prepare for Grey, Pratt, and Mills' depositions (5.1).
04/02/2025	6 TSK	25	221	335.00		13.90	13.90	4,656.50	Prep for Grey's deposition (3.7); take Grey's deposition (3.5); travel to/from AG's office in Everett for Grey's deposition (1.0); prepare for Mills and Pratt's depositions (5.7).
04/03/2025	6 TSK	25	222	335.00		9.90	9.90	3,316.50	Travel to/from MCC for Mills and Pratt's depositions (1.2); take Mills and Pratt's depositions (8.7).
04/04/2025	6 TSK	25	223	335.00		6.00	6.00	2,010.00	Draft deposition summaries and send to Petrak, Sandusky, and Savage (3.6); emails with opposing counsel re rescheduling Danni-Lynn's deposition, continuance of discovery motion deadline accordingly, and training records needed for all defendants (1.4); voicemails from client re [REDACTED] (.2); call with client [REDACTED] (.1); revise stipulated motion to move discovery completion and discovery motion deadlines (.5); emails with opposing counsel re subpoenas to inmates (.2).
04/07/2025	6 TSK	25	224	335.00		4.30	4.30	1,440.50	Appear for Riley's deposition (3.0); debrief with client re [REDACTED] (.2); research [REDACTED] [REDACTED] (.5); revise supplemental answers to interrogatories and requests for production (.5); review final draft of defendants' motion for continuance re deposition and discovery motion deadline (.1).
04/08/2025	6 TSK	25	225	335.00		4.90	4.90	1,641.50	Appear for Stoddard's deposition (2.6); debrief call with client re [REDACTED] (.2); confer with Savage re [REDACTED] (.1); call with Parker re call for declaration on attorney-client visits (.2); draft declaration for Parker (1.7); revise supplemental answers to interrogatories (.1).
04/09/2025	6 TSK	25	226	335.00		3.80	3.80	1,273.00	Draft declaration for Kampmann authenticating medical records (.5); email opposing counsel re same (.1); emails with AG's office re Sutherland's deposition and subpoena to Sutherland and Kampmann (.2); review [REDACTED] with Sandusky (.5) revise answers and responses to Crouse's second discovery requests (1.1); draft privilege log (1.1); emails with MCC and opposing counsel re Kampmann's deposition (.1); revise Parker declaration and email same to Parker (.2).
04/10/2025	6 TSK	25	229	335.00		0.10	0.10	33.50	Revise responses to Crouse's discovery requests.

Client: 2221.0001Z BAKER/JAMALL S. (Continued)

Date	Tkpr	Tcode	Ref #	Rate	Units	Hours Worked	Hours to Bill	Amount	Description
04/12/2025	6 TSK	25	242	335.00		4.70	4.70	1,574.50	Research spoliation motions in PLRA litigation.
04/13/2025	6 TSK	25	243	335.00		4.70	4.70	1,574.50	Review defendants' supplemental production.
04/14/2025	6 TSK	25	232	335.00		0.10	0.10	33.50	Call with client re [REDACTED].
04/15/2025	6 TSK	25	233	335.00		5.30	5.30	1,775.50	Appear for Danni-Lynn's deposition (4.8); draft supplemental discovery responses (.1); review declarations from other inmates for production (.1); call with Danni re deposition (.1); call with client re [REDACTED] (.2).
04/16/2025	6 TSK	25	234	335.00		8.80	8.80	2,948.00	Draft [REDACTED] (1.0); strategize spoliation motion with exhibits under seal [REDACTED] (1.0); prepare witness list and potential exhibits (2.8); review defendants' supplemental document production (4.0).
04/17/2025	6 TSK	25	235	335.00		3.10	3.10	1,038.50	Review [REDACTED] (.5); analysis of and emails with Savage and Sandusky re [REDACTED] spoliation evidence (2.6).
04/18/2025	6 TSK	25	236	335.00		2.90	2.90	971.50	Research grounds for spoliation motion and prepare exhibits for same (2.2); review defendants' responses to seventh set of requests (.7).
04/19/2025	6 TSK	25	241	335.00		7.70	7.70	2,579.50	Research authority for spoliation sanctions on defendants for DOC's failure to preserve evidence (2.7); draft motion for sanctions for spoliation (5.0).
04/20/2025	6 TSK	25	237	335.00		8.00	8.00	2,680.00	Draft spoliation motion.
04/21/2025	6 TSK	25	238	335.00		3.10	3.10	1,038.50	Draft spoliation motion (1.0); meet and confer with Williams re motion for sanctions and other outstanding discovery issues (1.0); email Williams re same (1.0); call with client re [REDACTED] (.1).
04/22/2025	6 TSK	25	239	335.00		10.10	10.10	3,383.50	Draft declaration in support of sanctions motion (.5); draft stipulated motion to seal (1.0); emails with Williams re meet and confer agreements and other issues related to outstanding discovery production (1.0); revise motion for sanctions to address new spoliation admissions and documents produced by opposing counsel on the same morning (4.6); draft proposed order granting motion for sanctions with findings of fact and curative instructions (3.0).
04/23/2025	6 TSK	25	244	335.00		1.50	1.50	502.50	Revise proposed order with authority to support sanctions.
04/23/2025	6 TSK	25	245	335.00		0.50	0.50	167.50	Draft praecipe re proposed order filing under seal.
04/25/2025	6 TSK	25	246	335.00		1.30	1.30	435.50	Review [REDACTED].
04/28/2025	6 TSK	25	248	335.00		0.20	0.20	33.50	Confer with Petrak re [REDACTED].
04/29/2025	6 TSK	25	254	335.00		1.30	1.30	435.50	Draft letter to court for [REDACTED].
04/30/2025	6 TSK	25	256	335.00		3.50	3.50	1,172.50	Filter privilege review of emails to and from client in prison (1.0); review defendants' late supplemental production and determine outstanding discovery issues [REDACTED] (2.5).
05/01/2025	6 TSK	25	276	335.00		0.60	0.60	201.00	Confer with Savage and Sandusky re [REDACTED] (2); confer with Petrak re [REDACTED] (2); emails with court reporter re Crouse video deposition (.1); confer with Savage re [REDACTED] (.1).
05/02/2025	6 TSK	25	257	335.00		1.20	1.20	402.00	Emails with court reporter re video synch for Crouse's deposition (.2); draft [REDACTED] (1.0).
05/05/2025	6 TSK	25	259	335.00		5.00	5.00	1,675.00	Determine deposition designations and substance of witness testimony for pretrial statement.
05/06/2025	6 TSK	25	260	335.00		4.20	4.20	1,407.00	Review documents for trial exhibits (3.8); call with client re [REDACTED] (4).
05/07/2025	6 TSK	25	265	335.00		5.80	5.80	1,943.00	Draft stipulated facts, questions of law, and claims for pretrial statement (3.0); research jury instructions (.8); review defendants' response to sanctions and outline reply to same (2.0).
05/08/2025	6 TSK	25	267	335.00		4.80	4.80	1,608.00	Draft stipulated facts and issues of law for pretrial statement (4.6); confer with Petrak re [REDACTED] (2).
05/09/2025	6 TSK	25	268	335.00		10.20	10.20	3,417.00	Review defendants' supplemental document production (4.0); finalize trial exhibits and stipulated facts in pretrial statement (2.0); research jury instructions [REDACTED] (3.9); call from client re [REDACTED] (3).
05/10/2025	6 TSK	25	275	335.00		5.60	5.60	1,876.00	Research for motions in limine and jury instructions.
05/12/2025	6 TSK	25	271	335.00		6.10	6.10	2,043.50	Draft reply in support of motion for sanctions (6.0); emails with client's [REDACTED] (1).
05/13/2025	6 TSK	25	274	335.00		9.30	9.30	3,115.50	Review deposition designations in support of reply for sanctions (2.0); draft reply in support of motion for sanctions (4.1); revise declaration (2); research and draft motions in limine (3.0).
05/14/2025	6 TSK	25	277	335.00		6.50	6.50	2,177.50	Confer with Savage and Sandusky re [REDACTED] (1.0); emails with Williams re Jpay subpoena and motions in limine conferral (.2); review defendants' training guidelines and references (5.3).
05/15/2025	6 TSK	25	280	335.00		8.30	8.30	2,780.50	Review training powerpoints re prison safety and offender rights (1.0); call with client re [REDACTED] (5); research motions in limine and jury instructions [REDACTED] (6.8).
05/16/2025	6 TSK	25	283	335.00		7.10	7.10	2,378.50	Review jpay subpoenaed documents for privilege and production (1.7); call from Danni re surgery in June (.1); call from Baker re [REDACTED] (2); research motions in limine and jury instructions [REDACTED] (5.1).
05/17/2025	6 TSK	25	286	335.00		9.40	9.40	3,149.00	Research and draft motions in limine.
05/18/2025	6 TSK	25	285	335.00		8.60	8.60	2,881.00	Research and draft preliminary and final jury instructions.

Reduced to
0.6 for Fee
Request

Client: 2221.0001Z BAKER/JAMALL S. (Continued)

Date	Tkpr	Tcode	Ref #	Rate	Units	Hours Worked	Hours to Bill	Amount	Description
05/19/2025	6 TSK	25	287	335.00		9.10	9.10	3,048.50	Draft motions in limine (4.6); meet and confer with Williams re motions in limine (1.1); revise motions in limine accordingly (3.4).
05/20/2025	6 TSK	25	289	335.00		8.20	8.20	2,747.00	Confer with Sandusky re [REDACTED] (2); emails with Williams re briefing schedule for motions in limine (1); review [REDACTED] defendants' motions in limine (7.9).
05/21/2025	6 TSK	25	294	335.00		4.00	4.00	1,340.00	Research [REDACTED].
05/22/2025	6 TSK	25	292	335.00		4.90	4.90	1,641.50	Call with client re [REDACTED] (4); continue research and begin draft responses to motions in limine (3.6); emails with client's criminal attorney re [REDACTED] (1); research and confer with Sandusky and Savage re [REDACTED] (5); emails with court reporter, Ormsby, and Russell re outstanding invoices (2); emails with Williams re transferring client and other inmate witnesses (1).
05/23/2025	6 TSK	25	296	335.00		3.00	3.00	1,005.00	Research and draft responses to motions in limine (1.0); call with Merchant re [REDACTED] (3); review Defendants' amended pretrial statement, including designated exhibits and new witnesses (1.7).
05/26/2025	6 TSK	25	297	335.00		3.30	3.30	1,105.50	Draft supplemental motions in limine based on Defendants' amended pretrial statement.
05/27/2025	6 TSK	25	298	335.00		9.10	9.10	3,048.50	[REDACTED] (4.7); draft supplemental motions in limine (4.7).
05/28/2025	6 TSK	25	301	335.00		9.10	9.10	3,048.50	Draft amended motions in limine (7.4); emails with court and Williams re oral argument on sanctions motion (1); confer with Petrak, Savage, and Keller re [REDACTED] (6); research and prepare for oral argument on sanctions motion (1.0).
05/29/2025	6 TSK	25	303	335.00		12.20	12.20	4,087.00	Draft first amended motions in limine and confer with Sandusky, Savage, and Petrak re [REDACTED] (3.3); emails with Williams re conferral on Plaintiff's amended motions in limine and trial subpoenas (2); revise cover letter for trial subpoenas (4); confer with Molina, Keller, and Taylor re [REDACTED] (5); review and revise proposed jury instructions (1.5); review defendants' deposition designations, identify objections, and make counter designations to depositions (6.3).
05/30/2025	6 TSK	25	305	335.00		16.10	16.10	5,393.50	Review defendants' deposition designations, identify objections, and make counter designations to depositions (2); confer with Keller and Taylor re [REDACTED] (1.0); pretrial meet and confer with Williams (2.1); revise jury instructions and pretrial statement (2.9); prepare for sanctions hearing and [REDACTED] (2.0); final revisions to deposition designations and exhibit objections (4.6); cite check and proofread amended motions in limine and declaration (1.5).
05/31/2025	6 TSK	25	307	335.00		3.00	3.00	1,005.00	Continue to cite check and proof motions in limine.
06/01/2025	6 TSK	25	311	335.00		9.10	9.10	3,048.50	Prepare for oral argument on sanctions motion (7.9); revise pretrial statement (3.7).
06/02/2025	6 TSK	25	310	335.00		9.20	9.20	3,082.00	Revise argument for hearing (4.4); mock argument with Keller and Taylor (1.0); review [REDACTED] (5); call with Petrak re [REDACTED] (9); review discovery responses and emails with counsel re destruction of recordings (1.0); research alternative requests for sanctions granted under Rule 37(e)(1) (1.4).
06/03/2025	6 TSK	25	312	335.00		10.20	10.20	3,417.00	Final preparations for motion for sanctions (3.6); appear for hearing on motion for sanctions (1.3); debrief hearing [REDACTED] (1.0); call with client re [REDACTED] (4); draft pretrial brief (3.9).
06/04/2025	6 TSK	25	313	335.00		7.60	7.60	2,546.00	Research cases re [REDACTED] (6.0); draft voir dire questions (1.5); emails with opposing counsel re jury instructions and pretrial order (1).
06/05/2025	6 TSK	25	314	335.00		6.60	6.60	2,211.00	Revise jury instructions and draft proposed pretrial order (6.4); emails with Rule re emergency check on client (2).
06/06/2025	6 TSK	25	315	335.00		6.00	6.00	2,010.00	Conference with Taylor re [REDACTED] (2.0); revise exhibit list and draft proposed pretrial order (4.0).
06/07/2025	6 TSK	25	316	335.00		2.50	2.50	837.50	Continue draft of trial brief.
06/07/2025	6 TSK	25	317	335.00		6.00	6.00	2,010.00	Draft trial brief.
06/08/2025	6 TSK	25	321	335.00		3.50	3.50	1,172.50	Draft trial brief.
06/09/2025	6 TSK	25	322	335.00		8.30	8.30	2,780.50	Conference with Taylor re [REDACTED] (3.0); conference with Williams re jury instructions, verdict forms, neutral statement of case, stipulated facts, joint pretrial order, and inmate restraints at trial (1.3); revise same per conference with Williams (4.0).
06/10/2025	6 TSK	25	323	335.00		7.00	7.00	2,345.00	Rewrite trial brief.
06/11/2025	6 TSK	25	324	335.00		9.40	9.40	3,149.00	Final revisions to rewrite of pretrial brief (3.0); cite check pretrial brief (1.3); draft responses to motions in limine (3.3); call with Kastle (1.8).
06/13/2025	6 TSK	25	325	335.00		4.00	4.00	1,340.00	Prepare for pretrial conference (1.5); attend pretrial conference (2.5).
Billable Total:						534.10	534.10	178,890.00	
06/02/2025	7 MVM	99	309	285.00		1.80	1.80	513.00	Review first amended motions in limine.
06/10/2025	7 MVM	99	318	285.00		2.30	2.30	655.50	Legal research re [REDACTED].

Client: 2221.0001Z BAKER/JAMALL S. (Continued)

Date	Tkpr	Tcode	Ref #	Rate	Units	Hours Worked	Hours to Bill	Amount	Description
Billable Total:		7 M. VICTORIA MOLINA				4.10	4.10	1,168.50	
05/16/2025	15 MDI	99	282	195.00		1.20	1.20	234.00	Prepare and produce responsive Jpay documents as JP000001-JP000011.
05/23/2025	15 MDI	99	295	195.00		0.70	0.70	136.50	Review May production documents from WA AG office for [REDACTED].
Billable Total:		15 MARTIN D. IHLE				1.90	1.90	370.50	
03/04/2025	16 KDP	99	179	550.00		1.30	1.30	715.00	Review discovery deficiency letter (1.0); email to opposing counsel regarding discovery and mediation (.3)
03/11/2025	16 KDP	99	184	550.00		0.60	0.60	330.00	Emails with opposing counsel regarding settlement and discovery
03/12/2025	16 KDP	99	190	550.00		1.50	0.80	440.00	Attend meet and confer with Kamjula and opposing counsel (1.5 -- .7 no charge)
05/13/2025	16 KDP	99	273	550.00		1.00	1.00	550.00	Review and revise reply on sanctions motion
05/28/2025	16 KDP	99	300	550.00		0.30	0.30	165.00	Conference with Kamjula regarding [REDACTED]
05/29/2025	16 KDP	99	308	550.00		1.50	1.50	825.00	Further review of briefing regarding sanctions motion
Billable Total:		16 KEITH D. PETRAK				6.20	5.50	3,025.00	
03/10/2025	19 JTS	99	188	195.00		0.10	0.10	19.50	Review defendants' productions made responsive to all discovery requests to determine where missing Bates numbered items are.
03/11/2025	19 JTS	99	187	195.00		1.30	1.30	253.50	Review client file documents from K&L Gates to determine privilege.
03/12/2025	19 JTS	99	189	195.00		2.70	2.70	526.50	Process plaintiff and defendant discovery production volumes and prepare database of materials for attorney document review (1.8); research [REDACTED] (.9).
03/13/2025	19 JTS	99	193	195.00		1.30	1.30	253.50	Update attorney binder with discovery materials (1.1); conference with Kamjula regarding [REDACTED] (.2).
03/14/2025	19 JTS	99	194	195.00		1.50	1.50	292.50	Continue research for [REDACTED] (1.5).
03/17/2025	19 JTS	99	198	195.00		0.50	0.50	97.50	Search [REDACTED]
03/19/2025	19 JTS	99	199	195.00		0.50	0.50	97.50	Update [REDACTED] regarding depositions.
03/20/2025	19 JTS	99	205	195.00		1.00	1.00	195.00	Process defendants' supplemental production received responsive to sixth request for production (.9); process K&L Gates' materials received as potentially responsive to defendants' subpoena request (.1).
03/21/2025	19 JTS	99	206	195.00		0.90	0.90	175.50	Process defendants' supplemental production regarding fifth and sixth requests for production, fourth request for interrogatories, and third objections to discovery requests.
03/25/2025	19 JTS	99	212	195.00		2.50	2.50	487.50	Research [REDACTED] (1.5); prepare deposition binders for Kamjula (1.0).
03/26/2025	19 JTS	99	213	195.00		2.80	2.80	546.00	Prepare deposition exhibits regarding Harris deposition.
03/27/2025	19 JTS	99	214	195.00		0.10	0.10	19.50	Process defendants' supplemental production responsive to sixth request for production by plaintiff.
03/28/2025	19 JTS	99	215	195.00		4.00	4.00	780.00	Conference with Kamjula regarding [REDACTED] (.2); update deposition exhibit binder (.8); prepare materials from K&L Gates responsive to subpoena for production (2.8); produce K&L Gates documents responsive to subpoena request (.2).
03/31/2025	19 JTS	99	216	195.00		5.50	5.50	1,072.50	Compile and review materials [REDACTED] regarding spoliation of evidence issue (.8); prepare privilege log regarding K&L Gates production responsive to subpoena (4.7).
04/01/2025	19 JTS	99	219	195.00		1.80	1.80	351.00	Conduct research [REDACTED]
04/02/2025	19 JTS	99	220	195.00		1.90	1.90	370.50	Compile materials for Kamjula review regarding [REDACTED] (.6); continue drafting privilege log regarding K&L Gates subpoena production (.8); process defendants' supplemental production to sixth request for production (.5).
04/08/2025	19 JTS	99	227	195.00		4.00	4.00	780.00	Process Harris and Crouse deposition transcripts and exhibits (3.0); compile [REDACTED] regarding spoliation [REDACTED] (1.0).
04/09/2025	19 JTS	99	228	195.00		3.90	3.90	760.50	Process Harris deposition video and Hoskins deposition transcripts and exhibits (.8); cite check declaration of Kampmann regarding authenticity of medical records (.2); prepare documents for plaintiff's fourth supplemental discovery response and redact personal information from medical records (2.9).
04/10/2025	19 JTS	99	230	195.00		1.90	1.90	370.50	Process Weiskopf deposition transcripts and exhibits (.8); prepare plaintiff's fourth production responsive to Crouse request for production (.8); compile [REDACTED] (.3).
04/11/2025	19 JTS	99	231	195.00		4.20	4.20	819.00	Continue analyzing [REDACTED] (3.9); process defendants' production responsive to plaintiff's second interrogatories and seventh request for production (.3).
04/14/2025	19 JTS	99	250	195.00		0.80	0.80	156.00	Process to Cloud9 defendants' March 27 and April 11 productions.
04/15/2025	19 JTS	99	251	195.00		1.70	1.70	331.50	Finalize production and cite check declaration (1.1); process video deposition files regarding Hoskins (.6).
04/16/2025	19 JTS	99	253	195.00		6.20	6.20	1,209.00	Process Grey deposition exhibits and transcripts (.7); update Kamjula discovery binder (1.2); review transcripts and discovery responses regarding [REDACTED] (4.3).
04/17/2025	19 JTS	99	252	195.00		3.30	3.30	643.50	Process April 11 production regarding Sutherland and Kampmann

Client: 2221.0001Z BAKER/JAMALL S. (Continued)

Date	Tkpr	Tcode	Ref #	Rate	Units	Hours Worked	Hours to Bill	Amount	Description
04/22/2025	19	JTS	99	240	195.00	7.70	7.70	1,501.50	documents. Process deposition transcripts and exhibits regarding Mills, Grey and Pratt (1.0); cite check motion for sanctions regarding spoliation of evidence and prepare exhibits to be filed under seal (6.7).
04/23/2025	19	JTS	99	249	195.00	1.30	1.30	253.50	Process defendants' supplemental production responsive to sixth request for production (.3); cite check proposed order granting motion for sanctions (.6); process Stoddard deposition transcripts (.4).
04/28/2025	19	JTS	99	247	195.00	0.50	0.50	97.50	Process defendants' supplemental production responsive to seventh request for production.
04/30/2025	19	JTS	99	255	195.00	1.70	1.70	331.50	Update deposition binder for Kamjula.
05/01/2025	19	JTS	99	258	195.00	1.70	1.70	331.50	Conference with Kamjula regarding [REDACTED] (.5); prepare deposition materials to be mailed to client (1.2).
05/02/2025	19	JTS	99	261	195.00	6.10	6.10	1,189.50	Process Crouse deposition video (.4); document review of [REDACTED] (3.5); prepare public records for production responsive to defendants' discovery requests (.7); prepare Love XOX subpoena responses for production and send materials via secure file share (.8); process Jpay records produced responsive to plaintiff's subpoena request and begin document review for privileged materials (.7).
05/05/2025	19	JTS	99	262	195.00	3.60	3.60	702.00	Continue Jpay document review for privileged materials.
05/06/2025	19	JTS	99	263	195.00	2.50	2.50	487.50	Process defendants' supplemental productions responsive to plaintiff's discovery request regarding training materials (1.0); compile potential trial exhibits for Kamjula review (1.2); conference with Kamjula regarding [REDACTED] (.3).
05/07/2025	19	JTS	99	264	195.00	0.30	0.30	58.50	Process defendants' supplemental production regarding training materials and responses to sixth requests for production by plaintiff.
05/08/2025	19	JTS	99	266	195.00	6.60	6.60	1,287.00	Draft trial deposition designations and begin preparing designations (3.2); begin preparation of exhibits to Kamjula declaration in support of reply regarding motion for sanctions (3.4).
05/09/2025	19	JTS	99	269	195.00	6.10	6.10	1,189.50	Review Pratt deposition Errata sheet (.3); begin compiling exhibits to reply regarding motion for sanctions (.8); continue drafting and preparing exhibits to pre-trial statement (5.0).
05/12/2025	19	JTS	99	270	195.00	5.20	5.20	1,014.00	Continue preparing exhibits regarding motion for sanctions: Weiskopf deposition transcript excerpts (.9); Harris deposition transcript excerpts (1.1); Crouse deposition transcript excerpts (1.9); compile selected production materials (.1); compile all dockets for Baker litigation post-2012 (1.2).
05/13/2025	19	JTS	99	272	195.00	5.90	5.90	1,150.50	Conference with Kamjula regarding declaration exhibits in support of motion to compel and for sanctions (.2); prepare video exhibits files for Court copies (1.9); cite check reply in support of motion for sanctions and prepare exhibits to Kamjula declaration (3.8).
05/14/2025	19	JTS	99	278	195.00	3.30	3.30	643.50	Prepare working copies of reply in support of sanctions and physical media exhibits for Court (.7); prepare physical media for electronic service to defense counsel (.3); research [REDACTED] (2.3).
05/15/2025	19	JTS	99	279	195.00	0.70	0.70	136.50	Conference with Kamjula and Sandusky regarding [REDACTED] (.4); conference with Sandusky regarding [REDACTED] (.3).
05/19/2025	19	JTS	99	284	195.00	3.70	3.70	721.50	Cite check jury instructions, motions in limine, and prepare exhibits to Kamjula declaration.
05/20/2025	19	JTS	99	288	195.00	0.50	0.50	97.50	Meeting with Kamjula regarding [REDACTED].
05/21/2025	19	JTS	99	291	195.00	5.90	5.90	1,150.50	Process defendants' pre-trial statement and deposition designations and prepare same for attorney review (3.0); prepare detailed analysis of production data to upload to CloudNine (.5); prepare defendants' supplemental productions for attorney review (2.4).
05/22/2025	19	JTS	99	293	195.00	2.80	2.80	546.00	Compile defendants' trial exhibits.
05/23/2025	19	JTS	99	299	195.00	4.40	4.40	858.00	Research [REDACTED] (3.2); process defendants' supplemental production of missing Bates numbers (1.2).
05/28/2025	19	JTS	99	302	195.00	3.60	3.60	702.00	Prepare hearing binder for Kamjula regarding motion for sanctions hearing.
05/30/2025	19	JTS	99	304	195.00	4.90	4.90	955.50	Conference with Kamjula regarding [REDACTED] (.3); pre-trial conference meeting (1.0); cite check motions in limine and prepare exhibits to Kamjula declaration (3.6).
Billable Total:		19 JESSICA T. SAVAGE				133.40	133.40	26,013.00	
05/14/2025	23	BJE	99	281	235.00	1.00	1.00	235.00	Review [REDACTED] for Sandusky.
05/21/2025	23	BJE	99	290	235.00	1.00	1.00	235.00	Prepare [REDACTED] for new production.
06/12/2025	23	BJE	99	319	235.00	12.00	12.00	2,820.00	Prepare [REDACTED]
06/14/2025	23	BJE	99	320	235.00	1.00	1.00	235.00	Prepare Trial Director [REDACTED]
Billable Total:		23 BRAULIO J. ESPINOZA				15.00	15.00	3,525.00	
Total Billable Fees						700.90	700.20	216,867.00	

Client: 2221.0001Z BAKER/JAMALL S. (Continued)

R E C A P						
Fees:	216,867.00					
Expenses:	0.00	Previous Balance:	0.00			
Advances:	0.00	Payments/Credits:	0.00			
Total WIP:	216,867.00	Balance Due:	0.00	Total:	216,867.00	
Other WIP:	Hours: 473.30	Fees: 153,783.50	Exps: 10,824.58	Advs: 18,761.11		
A/R:	0-30	31-60	61-90	91-120	121-180	181+
	0.00	0.00	0.00	0.00	0.00	0.00